12 February 2026

FAO: Oliver Salisbury
Senior Land Manager
Bellway Homes Limited (Yorkshire)

Spaces - Pennine Five, Block 2,
1 Tenter Street, Sheffield, S1 4BY

Dear Oliver,

RE: 2025/93355 Land off Woodward Court, Mirfield, WF14 0PY

Cura Terrae Land & Nature (Cura Terrae) was commissioned by Bellway Homes to prepare a response to the Ecology Team consultation comments dated 15 January 2026 and provide clarification on the ecological assessment and proposed mitigation associated with the proposed residential development at land east of Woodward Court, Mirfield, West Yorkshire, WF14 0PR (OS NGR: SE 20974 21050), hereafter referred to as 'the Site'.

Cura Terrae has assisted Bellway Homes with ecological matters relating to the Site as detailed within the following:

- Preliminary Ecological Appraisal (PEA) – *'Woodward Court, Mirfield – Preliminary Ecological Appraisal'*, Ref: 25566 V1.0, Dated September 2025 (Cura Terrae, 2025a).
- Ecological Impact Assessment (EcIA) – '*Woodward Court, Mirfield – Ecological Impact Assessment'*, Ref: 26095 V1.0, Dated December 2025 (Cura Terrae, 2025b).
- Biodiversity Net Gain Assessment (BNGA) (Design Stage) – *'Woodward Court, Mirfield – Biodiversity Net Gain Assessment'*, Ref: 25895 V2.0, Dated November 2025 (Cura Terrae, 2025c).
- Construction Environmental Management Plan (CEMP) *'Woodward Court, Mirfield – Construction Environmental Management Plan',* Ref: 26095 V1.0, Dated December 2025 (Cura Terrae, 2025d).

Cura Terrae acknowledges all draft planning conditions outlined within the consultee response in principle, including those relating to biodiversity net gain, protected species safeguards, invasive species management, ecological design strategy, sensitive lighting strategy, and tree and hedgerow protection. The purpose of this letter is therefore limited to providing clarification in respect of the request for bat activity surveys to be undertaken prior to planning determination.

As discussed within the PEA and EcIA reports (Cura Terrae, 2025a-b), the Site contains suitable foraging and commuting habitat for bats including grassland, bramble scrub, mature trees, hedgerows and a line of trees, which have connectivity to other hedgerows, mature trees and further suitable habitat in the wider area off-site. As such, the Site was deemed to display 'Moderate' suitability for foraging and commuting bats in accordance with good practice guidelines (Collins, 2023).

The proposals are focussed within the centre of the Site, which comprises lower suitability bat habitat (modified grassland and bramble scrub), with higher suitability features including boundary hedgerows and mature trees being partially retained. As such, foraging and commuting bats are unlikely to be significantly impacted, provided that habitat loss does not exceed that currently proposed and that retained habitats of higher ecological value are safeguarded during both the construction and operational phases of the development through implementation of the Construction Environmental Management Plan (CEMP) (Cura Terrae, 2025d), and production of a Habitat Management and Monitoring Plan (HMMP) and/or Landscape and Ecological Management Plan (LEMP) (or similar).

Mitigation measures will focus on the retention and enhancement, where feasible, of boundary features, together with a suitable lighting strategy to maintain these as dark corridors and preserve their functionality for bats and other nocturnal wildlife. These measures will maintain the functional character and connectivity of boundary habitats during both the construction and operational phases of the development.

Compensatory habitats for foraging and commuting bats will be created of higher quality compared to the habitats that will be lost, including wildflower grassland and native hedgerow, tree, and scrub planting, as shown in Golby & Luck Landscape Architects 'Woodward Court, Mirfield – Landscape Masterplan' (Drawing no: GLY0209 MP01A, Revision A, dated November 2025) and Design Stage BNGA (Cura Terrae, 2025c). These habitats will support a greater diversity of invertebrate prey and, together with the partial retention and protection of boundary features, will maintain the functionality of the Site for foraging and commuting bats post-development, although it is recognised that there will be a temporary time lag before compensatory habitats reach full maturity and functionality.

Given that the proposed mitigation strategy embedded within the scheme is based on habitat retention and creation, the implementation of precautionary safeguards, and sensitive lighting design, it is considered unlikely that the strategy would be influenced by the results of any bat activity surveys. The Site occupies a rural-fringe location adjacent to existing urban development, which is considered suitable primarily for a common and widespread assemblage of bat species rather than representing high suitability habitat of notable importance, and is unlikely to be relied upon solely by any local population of any given species. The measures embedded within the scheme are already sufficient to avoid significant impacts on local bat populations and to maintain ecological functionality irrespective of variations in species composition or recorded activity levels. As such, it is considered that undertaking any bat activity surveys at this stage would not provide any additional value, given that an appropriate and robust mitigation strategy has been designed and implemented in their absence, nor would they reasonably be expected to change the conclusions of this assessment.

Yours sincerely,

James Storey
Senior Ecologist

M:
E: james.storey@cura-terrae.com